



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

September 11, 2000

4APT-ARB

Mr. John E. Hornback, Director  
Division for Air Quality  
Department for Environmental Protection  
Natural Resources and Environmental  
Protection Cabinet  
803 Schenkel Lane  
Frankfort, Kentucky 40601

SUBJ: EPA's Review of Proposed Title V/Synthetic Permit for Eagle Industries, Inc.

Dear Mr. Hornback:

The purpose of this letter is to notify the Kentucky Department for Environmental Protection that the United States Environmental Protection Agency (EPA) formally objects to the issuance of the above referenced proposed title V operating permit for Eagle Industries, Inc. located in Bowling Green Plant, Kentucky, which was received by EPA on July 27, 2000.

Based on our review of the proposed permit, EPA formally objects, under the authority of Section 505(b) of the Clean Air Act (the Act) and 40 C.F.R. § 70.8(c), to the issuance of the title V permit for this facility. The basis of EPA's objection is that the permit does not contain all applicable requirements for the facility as required by 40 C.F.R. §70.6(a)(1).

Section 505(b)(1) of the Act and Section 40 C.F.R. § 70.8(c) require EPA to object to the issuance of a proposed permit in writing within 45 days of receipt of the proposed permit (and all necessary supporting information) if EPA determines that the permit is not in compliance with the applicable requirements under the Act or 40 C.F.R. Part 70. Pursuant to 40 C.F.R. § 70.8(c), a detailed explanation of the objection issues and the changes necessary to make the permit consistent with the requirements of 40 C.F.R. Part 70 are provided in the enclosure to this letter. Section 70.8(c)(4) and Section 505(c) of the Act further provide that if the State fails to revise and resubmit a proposed permit within 90 days to satisfy the objection, the authority to issue or deny the permit passes to EPA and EPA will act accordingly. Because the objection issues must be fully addressed within the 90 days, we suggest that the revised permit be submitted in advance in order that any outstanding issues may be addressed prior to the expiration of the 90-day period.

We are committed to working with you to resolve these issues. Please let us know if we may provide assistance to you and your staff. If you have any questions or wish to discuss this further, please contact Mr. Gregg Worley, Chief, Operating Source Section at (404) 562-9141.

Should your staff need additional information they may contact Ms. Jenny Jachim, Kentucky Title V Contact, at (404) 562-9126, or Ms. Lynda Crum, Associate Regional Counsel, at (404) 562-9524.

Sincerely,

*/S/ Winston A. Smith*

Winston A. Smith  
Director  
Air, Pesticides & Toxics  
Management Division

cc: Rick S. Shewekah, Kentucky Department of Environmental Protection  
Mr. Bill Garrison, Controller Eagle Industries

## Enclosure

U.S. EPA Region 4 Objection  
Proposed Part 70/ Synthetic Minor Operating Permit  
Eagle Industries, Inc.  
Bowling Green, Kentucky  
Permit no. V-00-013

### **I EPA Objection Issue**

#### **1. PSD Applicability:**

As per the Statement of Basis for the draft title V permit (permit No. V-00-013), Eagle Industries' Hope Street/Curio Plant and Main Street Plant originally operated under two separate permits (V-97-042 and F-97-015, respectively). On June 28, 1999, Eagle Industries submitted an application for a Synthetic Minor/Title V permit for the construction and operation of an additional manufacturing line component at the Main Street Plant location. The Executive Summary for the proposed title V permit indicates that it was at the time of application submittal that Kentucky Department of Air Quality (DAQ) determined that the Main Street Plant and the Hope Street/Curio Plant were adjacent sources and that the permits for these sources needed to be consolidated.

The current proposed permit is a consolidation of Eagle Industries' Hope Street/Curio Plant and the Main Street Plant. This permit includes a 249 tons per year (tpy) limit on VOC emissions for the Hope Street Finishing line and replaces a previously permitted 225 tpy VOC emissions limit for the Curio line with a 39 tpy limit. Additionally, this proposed permit removes a previously permitted 100 tpy VOC emissions limit on the original Main Street Plant and replaces it with a 249 tpy VOC emissions limit on the original Main Street line combined with the additional component to be constructed.

Based on our understanding of the developmental history of the Hope Street and Main Street facilities and on our opinion that the two facilities have always been parts of one source, the following actions are needed to achieve compliance with prevention of significant deterioration (PSD) permitting requirements:

- The VOC emission rate of the Curio line at the Hope Street plant can remain at 225 tpy, but the Curio line must undergo a PSD review including a best available control technology (BACT) evaluation to justify this emission rate. If the BACT evaluation does not justify an emission rate of 225 tpy, the emission rate must be reduced.
- The proposed addition at the Main Street plant must undergo PSD review before construction can begin, or the total VOC emissions increase associated with this addition must be limited to less than 40 tpy. The calculation of total emissions increase must include emissions directly from the additional component plus any

emissions increases elsewhere in the Main Street or Hope Street plants that may result from the additional component.

**General Comment:**

**1. Recordkeeping Requirements:**

In order for the permit to be practicably enforceable and ensure that the VOC emissions caps are not exceeded, the permit must contain detailed recordkeeping requirements or operational limitations. While it may be difficult to provide operational limitations (e.g., usage limits of specific coatings) due to the variety of coatings used at the facility, the permit should contain requirements for the source to keep detailed records of coatings used as a means of calculating VOC emissions on a regular basis. The Statement of Basis provided with the draft title V permit for Eagle Industries, Inc., indicates that the source shall “keep records of the monthly and twelve months rolling total for VOC, HAP and VHAP emissions at the finishing line each month.” However, the proposed title V permit for this source does not appear to require the source to keep such records. After discussing this omission with the permitting staff at Kentucky DAQ, it is our understanding that the State will revise the proposed permit to include recordkeeping requirements detailing how and what type of records the source will need to keep in order to track the VOC emissions on a 12-month rolling total basis.